

**To:** Rao, Kate[Rao.kate@epa.gov]  
**From:** Dermer, Michele  
**Sent:** Thur 7/16/2015 3:47:05 PM  
**Subject:** Re: FINAL draft CA UIC Desk Statement re: July 15th deliverable

I just got on line - it took more than 45 minutes. i'm on OWA lite fially. Sorry, I would have contacted you sooner.

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**From:** Rao, Kate  
**Sent:** Thursday, July 16, 2015 8:44 AM  
**To:** Montgomery, Michael; Albright, David; Engelman, Alexa; Moffatt, Brett; McWhirter, Lisa; Dermer, Michele  
**Subject:** FINAL draft CA UIC Desk Statement re: July 15th deliverable

David –

Attached is the final draft of the desk statement. It has been reviewed by the team. It appears the package contains the material we expected so I do not think we need to make any more changes.

I will forward it on to OPA once you have a chance to review it.

Thanks. Kate

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**From:** Rao, Kate  
**Sent:** Tuesday, July 14, 2015 8:27 AM  
**To:** Montgomery, Michael; Albright, David; Engelman, Alexa; Moffatt, Brett; McWhirter, Lisa; Dermer, Michele; Mogharabi, Nahal  
**Cc:** Keener, Bill  
**Subject:** RE: DRAFT CA UIC Desk Statement re: July 15th deliverable

CA UIC Team –

Attached is revised draft of desk statement which incorporates final edits from Mike. I can make additional edits as needed after the UIC update with Jared at 11 am today.

Kate

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**From:** Rao, Kate  
**Sent:** Thursday, July 09, 2015 12:00 PM  
**To:** Montgomery, Michael; Albright, David; Engelman, Alexa; Moffatt, Brett; McWhirter, Lisa; Dermer, Michele; Mogharabi, Nahal  
**Subject:** DRAFT CA UIC Desk Statement re: July 15th deliverable

Mike et al –

Attached is the draft desk statement. Please provide me your thoughts/edits/comments. Lisa and Alexa provided me some initial input which is incorporated in the draft.

We have not been updating the CA UIC webpage (<http://www.epa.gov/region9/mediacenter/uic-review/index.html>) to include discussions on milestones. However, we may want to refresh the Qs and As. I will discuss with Lisa next week. We will add the July 15<sup>th</sup> letter we get from the state under the RESOURCES box.

Note: the May 15<sup>th</sup> desk statement is below. We did not get any media inquiries so it never went out.

Kate

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**From:** Rao, Kate  
**Sent:** Monday, May 18, 2015 2:03 PM  
**To:** Montgomery, Michael; Albright, David; Dermer, Michele; Zito, Kelly; Keener, Bill; Mogharabi, Nahal; Skadowski, Suzanne  
**Cc:** Maier, Brent  
**Subject:** CA UIC Desk Statement re: May 15th deliverable

Below is final desk statement. Includes edits by OPA and has correct link to DOGGR webpage with May 15<sup>th</sup> material.

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U.S. EPA is continuing its review of California's Division of Oil, Gas and Geothermal Resources' (DOGGR) Class II Underground Injection Control primacy program, including the state's implementation of the Class II UIC program, the identification of Class II injection wells that may be injecting into non-exempt aquifers, the state's ongoing assessment of drinking water sources that may be impacted by improper injection, and the establishment of an effective process for reviewing and approving aquifer exemptions in California. EPA's December 22, 2014, letter directed the state to submit a Program Revision Plan by February 6, 2015. After reviewing the state's plan, and based on further discussion with the state agencies, EPA issued a letter to the state on March 9, 2015 concurring on key aspects of the state's plan and setting out a schedule of required activities and deliverables, with target milestones and compliance deadlines to ensure that the state continues to make progress towards full compliance with the Safe Drinking Water Act, and meets a February 15, 2017 compliance deadline for Class II wells currently injecting into non-exempt aquifers.

On May 15, 2015, EPA received the state's submittal in accordance with the timeframe set forth in EPA's March 9, 2015 California Class II UIC Program Corrective Action Plan Schedule, which required:

- completed evaluations for "Category 1" injection wells (this is the state's review of the Class II water disposal wells injecting into non-exempt, non-hydrocarbon-bearing aquifers and the 11 aquifers historically treated as exempt); and

- a revised Enclosure B of the State's February 6, 2015 letter to incorporate cyclic steam wells and provide a schedule for completing a review of these wells and submission of proposed aquifer exemptions, as applicable, to meet the February 15, 2017 compliance deadline.

EPA is reviewing the submitted material, which is publicly available on the state's website at: [http://www.conservation.ca.gov/dog/general\\_information/Pages/UndergroundInjectionControl\(UIC\).aspx](http://www.conservation.ca.gov/dog/general_information/Pages/UndergroundInjectionControl(UIC).aspx). After completing our review over the next few weeks, EPA expects to provide a written response to the state regarding the information it submitted.

EPA will continue our oversight of the state's efforts to ensure that California's Class II UIC program is in compliance with the Safe Drinking Water Act. To access information about EPA's review of CA's UIC program, please visit: <http://www.epa.gov/region9/mediacenter/uic-review/index.html>.

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